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January 31, 2005

Mr. Anthony Cinque
Case Manager
Bureau of Federal Case Management
Division of Responsible Site Party Remediation
CN028
Trenton, NJ 08625

Subject: L.E. Carpenter & Company, Wharton New Jersey, NJD002168748
Pre-Construction Boring Report

Dear Mr. Cinque:

As stated during our conference call on November 4, 2004 with both the New Jersey Department of Environmental Protection (NJDEP) and the United States Environmental Protection Agency (USEPA), and during the Remedial Action Work Plan (RAWP) implementation pre-construction meeting held on-site on January 6, 2005, please find attached a summary of the pre-construction borings intended to provide detailed delineation of the vertical extent of light nonaqueous-phase liquids (LNAPL) smear zone. The summary also includes a description of the excavation cells and details regarding how excavation of each cell will proceed based on these new data.

L.E. Carpenter & Company (LEC) is currently in the process of excavating and disposing of the lead-contaminated soils, and anticipates beginning the free product (LNAPL) source reduction on about February 21, 2005. As discussed in our November 5, 2004 letter, we request NJDEP issue a variance from the confirmatory sampling requirements outlined in the "Technical Requirements for Site Remediation" (N.J.A.C 7:26E-1 et seq.) based on the data summarized in the attached technical memorandum and associated Figures and Table. This variance will apply to confirmatory sampling associated with the smear zone (LNAPL) excavation only, based on the data provided by the 32 preconstruction borings we have used to define the vertical extent of the smear zone. We understand the variance will also be based on accomplishment of a survey-controlled slurry excavation to the new target depths we have defined.

In addition, we request NJDEP approve the pre-construction Polychlorinated Biphenyl (PCB) sample results as satisfying the requirements for the outer perimeter verification samples designated in the approved RAWP with comments.

RMT looks forward to completion of the source reduction construction project outlined in the RAWP.



Mr. Anthony Cinque New Jersey Department of Environmental Protection (NJDEP) January 28, 2005 Page 2 of 2

Please feel free to contact Nick Clevett at (616) 975-5415 with any questions you may have regarding the RAWP, the responses, and project schedule.

Sincerely,

RMT, Inc.

Nicholas J. Clevett

Project Manager

James J. Dexter

Senior Hydrogeologist

Attachments: Pre-Construction Boring Report

Figures 1 – 6

Appendix A – Geologic Boring Logs

Appendix B - Laboratory Data Sheets for PCB Testing

cc: Stephen Cipot, USEPA Cris Anderson, LEC Ernie Schaub, LEC RMT Project Team Central File(s)